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January 31, 2024

BY ECF

Honorable Vera M. Scanlon
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Lucy York v. The City of New York et al. 22-CV-06432 (OEM) (VS)

Your Honor:

I am a Senior Counsel with the New York City Law Department, and the attorney newly-assigned to the above-referenced matter. Defendants write with Plaintiff's consent to respectfully request a sixty-day extension to all deadlines. The Court previously granted the parties' joint request for a thirty-day extension on January 5, 2024.

Defendants require an extension so that I may familiarize myself with the case. A notice of my appearance was filed with the Court today. The attorney from my office who was previously assigned to this case, and appeared on behalf of the Defendants, Thomas Lai, took an unexpected leave. Additionally, I will be out of the office from March 1st – March 10th. I have no prior knowledge of this case and was notified about replacing Mr. Lai earlier today. Upon being assigned to this case, I immediately contacted Plaintiff's counsel to request an extension of time to all deadlines.

Accordingly, it is respectfully requested that the Court ordered deadlines contained in Mr. Lai's January 4, 2024 letter be adjusted by sixty-days, as set forth below:

- Both parties shall cooperate and use best efforts to identify the remaining John Doe Officer on or before April 1, 2024; if Plaintiff believes some document requires expedited production to accomplish this, they may file a motion seeking it after meeting and conferring with Defendants on or before April 1, 2024;
- March 26, 2024:
 - Deadline for Defendants to respond to Plaintiff's First Requests for Admission;

- Deadline for Defendants to respond to Plaintiff's First Set of Interrogatories and Document Requests; and
 - Deadline for Plaintiff to respond to Defendants First Set of Interrogatories and Request for Production of Documents;
- April 5, 2024:
 - Deadline for Plaintiff to file an amended complaint;
- August 5, 2024:
 - Deadline to complete all fact discovery;
- If Plaintiff is to perform expert discovery, they will serve expert disclosures, pursuant to Fed. R. Civ. Pr. 26(a)(2)(A) by September 6, 2024;
- Plaintiff's Initial expert report will be served by October 7, 2024;
- Defendants' Rebuttal expert report will be served by November 8, 2024;
- All discovery, including expert depositions, will be completed by January 6, 2025, and the parties will file a joint letter on that same date certifying the close of all discovery.

Thank you for your time and consideration of this request.

Respectfully submitted,

Peter Scutero

Peter Scutero
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cc: All Counsel (via ECF)